UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ARISTA RECORDS LLC; ATLANTIC RECORDING CORPORATION; ARISTA MUSIC, fka BMG MUSIC; CAPITOL RECORDS, LLC, fka CAPITOL RECORDS, INC.; ELEKTRA ENTERTAINMENT GROUP INC.; INTERSCOPE RECORDS; LAFACE RECORDS LLC; MOTOWN RECORD COMPANY, L.P.; PRIORITY RECORDS LLC; SONY MUSIC ENTERTAINMENT, fka SONY BMG MUSIC ENTERTAINMENT; UMG RECORDINGS, INC.; VIRGIN RECORDS AMERICA, INC.; and WARNER BROS. RECORDS INC.,

Plaintiffs,

v.

LIME WIRE LLC; LIME GROUP LLC; MARK GORTON; and M.J.G. LIME WIRE FAMILY LIMITED PARTNERSHIP,

Defendants.

06 Civ. 05936 (KMW)
ECF CASE

PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PARTIAL SUMMARY JUDGMENT ON THE DIRECT INFRINGEMENT OF THE WORKS AT ISSUE

Glenn D. Pomerantz *(pro hac vice)*
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Date: January 27, 2011

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that as soon as counsel may be heard before the Honorable Kimba M. Wood in Courtroom 15B, United States Courthouse, 500 Pearl Street, New York, New York, all Plaintiffs in Case No. 06 Civ. 05936 ("Plaintiffs") will and hereby do move the Court pursuant to Federal Rule of Civil Procedure 56 and the Local Rules of the Southern District of New York, for an Order granting Plaintiffs partial summary judgment on the issue of the direct infringement of the works in suit.

PLEASE TAKE FURTHER NOTICE that this Motion is based on the Notice of Motion, Motion, the accompanying Memorandum of Law, the Declarations of Kelly M. Klaus, Thomas Sehested, and Chris Connelly, along with all accompanying evidence attached and incorporated by reference, the Rule 56.1 Statement, any Reply Memorandum in support, the court records and files, and upon such other evidence and argument that may be offered at the hearing on the Motion.

Dated: January 27, 2011

Respectfully submitted,

/s/ Kelly M. Klaus
Kelly M. Klaus

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